



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

July 18, 2019

LARRY J. STEINBERG, TREASURER
MCCONNELL SENATE COMMITTEE
PO BOX 1496
LOUISVILLE, KY 40201

Response Due Date
08/22/2019

IDENTIFICATION NUMBER: C00193342

REFERENCE: APRIL QUARTERLY REPORT (01/01/2019 - 03/31/2019)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for some of these contributions.

An individual or a political committee other than an authorized committee or a qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,800 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The attached committees did not meet the qualifications for multi-candidate status as of the date the contribution(s) was made. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR §§ 110.1(b), (e) and (k), and 102.13(c))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

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Please be reminded that all refunds, redesignations and reattributions must be made within 60 days of receipt of the contribution. To date, one or more of the apparent excessive contributions have not been refunded, redesignated, or reattributed.

For reattributions, the funds can be retained if, within 60 days of receipt, the excessive amount was properly reattributed to another person. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor who signed the check an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount was properly designated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) the committee redesignates by presumption the excessive portion of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) A contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt, the excessive amount must be refunded. (11 CFR § 103.3(b)(1))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question.

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Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate and/or reattribute the excessive amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions that appear to be from a limited liability corporation(s) (LLC) (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for some of these contributions. 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim corporate status and those that are publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information. A partnership is included in the definition of "person" under 52 U.S.C. § 30101(11) (formerly 2 U.S.C. §431(11)).

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due

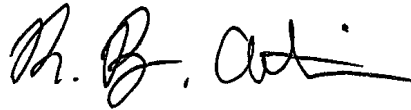
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date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1196.

Sincerely,

A handwritten signature in black ink, appearing to read "B. B. Austin", with a stylized flourish at the end.

Bradley Austin
Senior Campaign Finance Analyst
Reports Analysis Division

Apparent Excessive, Prohibited, and Impermissible Contributions
McConnell Senate Committee (C00193342)

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Cantor, Drew	6/30/17	\$1,000.00	P2020
Cantor, Andrew Mr.	3/31/19	\$2,800.00	P2020
Piper, William H Mr	1/8/15	\$1,000.00	P2020
Piper, William H Mr	1/5/16	\$1,000.00	P2020
Piper, Billy H. Mr.	1/10/17	\$700.00	P2020
Piper, William H Mr	3/31/18	\$900.00	P2020
Piper, Billy H. Mr.	3/6/19	\$100.00	P2020
Stone, William Mr.	6/23/17	\$300.00	G2020
Stone, William Mr.	9/30/17	\$250.00	G2020
Stone, William Mr.	12/31/17	\$1,000.00	G2020
Stone, William Mr.	3/4/19	\$400.00	G2020
Stone, William Mr.	3/31/19	\$1,000.00	G2020

Apparent Excessive Contributions from Committees

Contributor Name	Date	Amount	Election
Beam Suntory Inc. PAC	6/30/16	\$2,500.00	P2020
Beam Suntory Inc. PAC	6/30/18	\$1,333.33	P2020
Beam Suntory Inc. PAC	3/31/19	\$1,167.67	P2020
Crowell & Moring PAC	6/28/16	\$2,300.00	G2020
Crowell & Moring PAC	12/31/17	\$400.00	G2020
Crowell & Moring PAC	3/31/19	\$4,600.00	G2020
Edison Intl Companies Federal PAC	3/31/17	\$2,500.00	G2020
Edison Intl Companies Federal PAC	3/31/18	\$1,000.00	G2020
Edison Intl Companies Federal PAC	3/29/19	\$2,500.00	G2020
National Multi Housing PAC	12/31/17	\$2,500.00	P2020
National Multi Housing PAC	3/29/19	\$5,000.00	P2020
The Hartford Advocates Fund	12/31/17	\$1,000.00	G2020
The Hartford Advocates Fund	3/31/18	\$2,500.00	G2020
The Hartford Financial Services Group, Inc. Federal PAC (AKA Hatford Advocates Federal Fund)	1/10/19	\$2,000.00	G2020

Apparent Excessive, Prohibited, and Impermissible Contributions
McConnell Senate Committee (C00193342)

Apparent Excessive Contributions from Affiliated Committees

Contributor Name	Date	Amount	Election
Columbia Pipeline Group, Inc. PAC	3/31/16	\$1,000.00	P2020
Columbia Pipeline Group, Inc. PAC	3/31/16	\$2,500.00	P2020
Columbia Pipeline Group, Inc. PAC	4/27/16	\$1,500.00	P2020
NiSource Inc. PAC	3/18/19	\$2,500.00	P2020
General Electric Company PAC	6/17/15	\$1,000.00	P2020
Haier US Appliance Solutions, Inc. DBA GE Appliances Political Action Committee	5/7/18	\$1,000.00	P2020
General Electric Company PAC	3/4/19	\$4,000.00	P2020
Southern Company PAC	5/9/16	\$2,500.00	G2020
NextEra Energy PAC	3/27/19	\$5,000.00	G2020
Tesoro PAC	6/30/18	\$5,000.00	G2020
Marathon Petroleum Corporation Employees Political Action Committee (MPAC)	2/12/19	\$5,000.00	G2020
Tesoro PAC	6/30/18	\$5,000.00	P2020
Marathon Petroleum Corporation Employees Political Action Committee (MPAC)	2/12/19	\$5,000.00	P2020

Apparent Excessive Contributions from Committees not Qualified for Multi-Candidate Status

Contributor Name	Date	Amount	Election
Business Software Alliance PAC	3/31/17	\$1,000.00	G2020
Business Software Alliance PAC	3/31/19	\$2,500.00	G2020
First Data Corporation Political Action Committee First Data PAC	2/12/19	\$5,000.00	P2020

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
Chrysalis Holdings LLC	3/31/19	\$1,000.00	P2020
Hazen Construction LLC	3/27/19	\$2,200.00	G2020
Hazen Construction LLC	3/27/19	\$2,800.00	P2020
Mesa ZS Partner LLC	3/31/19	\$1,000.00	P2020